

STATE OF NEW MEXICO

BEFORE THE SECRETARY OF ENVIRONMENT

NEW MEXICO ENVIRONMENT  
DEPARTMENT RESOURCE  
PROTECTION DIVISION,

Case No. SWB 20-01 (CO)

Complainant,

v.

BL SANTA FE, LLC,

and

HRV HOTEL PARTNERS, LLC

Respondents.

**RESPONDENT BL SANTA FE, LLC'S FIRST SET OF INTERROGATORIES**

TO: Christopher Atencio  
New Mexico Environment Department  
121 Tijeras Avenue NE  
Albuquerque, NM 87012

Pursuant to 20.1.5.300 NMAC, Respondent BL Santa Fe, LLC ("BL Santa Fe") requests that New Mexico Environment Department respond to the below Interrogatories.

**DEFINITIONS**

1. The "Compliance Order" means the Administrative Order Requiring Compliance and Assessing a Civil Penalty issued to BL Santa Fe, LLC and HRV Hotel Partners, LLC, No. SWB 20-001(CO), dated January 29, 2020.

2. The "Pueblo" means the Pueblo of Pojoaque, including any past or present tribal council members, general council members, elected officials, representatives, agents, employees, attorneys, and all others acting for or on its behalf.

3. "Regarding" means in any way or degree pertaining to, arising out of, relating to, or concerning.



1           6.       How long has the disposal location described in paragraph 21 of the Compliance  
2 Order accepted waste for disposal, who operates the location, and what is the volume and  
3 characteristics of the waste that has been placed at the location for the past ten (10) years?

4           7.       With respect to each of your witnesses to be presented at the hearing, what is the  
5 subject matter and content of their expected testimony?

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7           DATED this 13<sup>th</sup> day of December, 2021.

8                               SNELL & WILMER L.L.P.

9                               

10           By: \_\_\_\_\_

11                               Gregory J. Marshall  
12                               One Arizona Center  
13                               400 E. Van Buren  
14                               Phoenix, Arizona 85004-2202  
15                               Telephone: 602.382.6514  
16                               Email: gmarshall@swlaw.com

17                               *Counsel for Respondent BL Santa Fe, LLC*

18           The foregoing interrogatories are issued in accordance with 20.1.5.300(F)(1) NMAC.

19           By: \_\_\_\_\_

20                               Gregory Chakalian  
21                               Hearing Officer  
22                               Administrative Hearings Office  
23  
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26  
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**CERTIFICATE OF SERVICE**

I certify that on this 13<sup>th</sup> day of December, 2021, a copy of the foregoing First Set of Interrogatories was served via first class mail and email to the following:

Christopher Atencio  
Assistant General Counsel  
Legislative & Policy Legal Analyst  
New Mexico Environment Department  
Office of General Counsel  
121 Tijeras Ave. NE  
Albuquerque, NM 87102  
[christopher.atencio@state.nm.us](mailto:christopher.atencio@state.nm.us)

*Counsel for the New Mexico Environment Department*

Holland Development Company (fka HRV Hotel Partners, LLC)  
112 West San Francisco, Suite 310  
Santa Fe, NM 87501

